

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CATHAY BANK,	)
	)
<i>Plaintiff.</i>	)
	)
v.	)
	)
KINGSTON WIND INDEPENDENCE	)
LLC, a Massachusetts Limited Liability	)
Company, BRADFORD CLEAVES, an	)
individual, KIALLY M. RUIZ, an	)
individual, and DUNCAN PETERSON, an	)
individual,	)
	)
<i>Defendant.</i>	)
	)

**PLAINTIFF’S MOTION FOR EX-PARTE PREJUDGMENT ATTACHMENT**

Plaintiff Cathay Bank hereby moves for an attachment of real property in an amount up to \$1,800,000.00, pursuant to Fed. R. Civ. P. 64 and Mass. Gen. Laws c. 233, § 42. In support of this motion, Cathay Bank relies on the Verified Complaint, its incorporated Exhibits, the Memorandum of Law in Support of Motion for Ex-Parte Prejudgment Attachment, and the Affidavit of Grant A. Pattison filed herewith (“Pattison Aff.”) which collectively demonstrate that there is a reasonable likelihood that Cathay Bank will recover judgment in an amount equal to or greater than the amount requested over and above any liability insurance known or reasonably believed to be available.

WHEREFORE, for the foregoing reasons, Plaintiff Cathay Bank respectfully moves the Court to enter an attachment of the real property owned by Defendant Duncan Peterson located at 12 Cousens Circle, Newton Centre, Massachusetts, in an amount up to \$1,800,000.00

Respectfully submitted,

**CATHAY BANK,**

By its attorneys,

/s/ *Melissa Bruynell Manesse*

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